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*Attorneys for Defendant Laylow  
Films, Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

GENERAL CROOK,

Plaintiff,

v.

WALT DISNEY COMPANY; HEARST  
COMMUNICATIONS, INC.; LAYLOW  
FILMS, INC.; HOULIHAN FILM MUSIC  
INC.; BURGESS L. GARDNER d/b/a  
MERYE-EARL MUSIC; and JOHN DOE  
AND MARY ROE,

Defendants.

Case No.

**NOTICE OF REMOVAL  
PURSUANT TO 28 U.S.C. § 1441 (a)**

TO: THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA:

TO: General Crook, Plaintiff *pro se*:

1. Laylow Films, Inc. (“LFI”) is one of the defendants in the civil action *Crook v. Walt Disney Co. et. al.*, No. A-18-772523-C, brought by Plaintiff General Crook (“Crook”) on April 10, 2018 in the Eighth Judicial District Court, Clark County, Nevada (the “Litigation”). Pursuant to 28 U.S.C. §§ 1441 and 1446, LFI hereby removes this action to the

1 United States District Court for the District of Nevada, the judicial district in which the  
2 underlying Litigation is pending.

3 2. LFI removes the Litigation on the ground that Crook has alleged, *inter*  
4 *alia*, violations of the Lanham Act, 15 U.S.C. §§ 1114 and 1125, and the Copyright Act, 17  
5 U.S.C. § 501. Accordingly, removal is proper under 28 U.S.C. § 1441(a) because, if this action  
6 had been filed in federal court, this Court would have (i) original subject matter jurisdiction over  
7 Crook's federal trademark and copyright infringement claims pursuant to 28 U.S.C. § 1331  
8 (federal question); and (ii) supplemental jurisdiction over Crook's related Nevada state-law  
9 claims pursuant to 28 U.S.C. § 1367(a).  
10

11 3. This notice is timely under 28 U.S.C. § 1446 (b)(1) as it was filed within  
12 thirty days after April 17, 2018, the date on which LFI received a copy of the complaint filed in  
13 the Litigation from co-defendant ESPN, Inc. As of the filing of this notice, to LFI's knowledge  
14 neither LFI nor any other defendant in the Litigation has been properly served. LFI reserves all  
15 rights and defenses, including without limitation defenses as to the lack of service of process  
16 and/or insufficiency of service of process.  
17

18 4. To LFI's knowledge, the only pleadings filed in the underlying Litigation  
19 to date is Crook's complaint, which is attached hereto as Exhibit A.  
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5. Defendant is providing Plaintiff written notice of the filing of this Notice of Removal as required by 28 U.S.C. § 1446(d). Further, Defendant is filing a copy of this Notice of Removal with the Clerk of the District Court, Clark County, Nevada, where the action is currently pending.

Dated May 9, 2018.

Respectfully,

**KENNEDY & COUVILLIER**

/s/ Todd E. Kennedy

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*Attorneys for Defendant Laylow Films, Inc.*

**CERTIFICATE OF SERVICE**

I certify that on May 9, 2018, I caused to be served the foregoing Notice of Removal on Plaintiff General Crook by placing the same in the United States Mail addressed to:

General Crook  
4319 Bucking Bronco Road  
North Las Vegas, Nevada 89032

/s/ Todd E. Kennedy

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An employee of Kennedy & Couvillier

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